

1 DOWNEY BRAND LLP
 2 JAMIE P. DREHER (Bar No. 209380)
 3 JOSEPH K. LITTLE (Bar No. 322179)
 4 Email: jdreher@downeybrand.com
 5 621 Capitol Mall, 18th Floor
 6 Sacramento, California 95814
 7 Telephone: 916.444.1000
 8 Facsimile: 916.444.2100

9 Attorneys for CAROL STRUVE

10 UNITED STATES BANKRUPTCY COURT
 11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 In re

13 PG&E Corporation,

14 and

15 PACIFIC GAS AND ELECTRIC
 16 COMPANY,

17 Debtors.

18 ☐ Affects PG&E Corporation
 19 ☐ Affects Pacific Gas and Electric Company
 20 ☒ Affects both Debtors

21 *All papers shall be filed in the Lead Case,
 22 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
 Lead Case, Jointly Administered

**DECLARATION OF RICHARD
 FRANKEL IN SUPPORT OF MOTION
 PURSUANT TO FED. R. BANKR. P.
 9006(b)(1) TO ENLARGE THE TIME FOR
 CAROL STRUVE TO FILE PROOF OF
 CLAIM**

Date: February 24, 2021
 Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102
 Judge: Hon. Dennis Montali

Objection deadline: February 17, 2020
 4:00 p.m. (Pacific Time)

23 I, Richard Frankel, hereby declare as follows:

24 1. I am an attorney at law duly licensed to practice before the courts of the State of
 25 Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP,
 26 based in Redding, California.

27 2. My law firm represents wildfire victims who sustained losses from the Camp Fire
 28 in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses
 clients have suffered as a result of these fires.

3. I understand that my client, Carol Struve, lost her home to the Camp Fire. The

1 address was 1447 Lofty Lane, Paradise, CA 95969.

2 4. On information and belief, Ms. Struve suffered from posttraumatic stress disorder
3 from an earlier incident involving the death of her son. The events of the Camp Fire, including the
4 loss of her home and personal property and her forced evacuation, worsened Ms. Struve's
5 condition.

6 5. Also on information and belief, Ms. Struve did not have insurance on her home at
7 the time of the Camp Fire. Ms. Struve thought she had pursued a claim herself pursuant to this
8 litigation but was recently surprised to find that she did not accomplish as much. When Ms.
9 Struve learned of this, she promptly contacted me, and I instructed counsel to prepare and file Ms.
10 Struve's motion.

11 6. On February 3, 2021 I filed a proof of claim for Ms. Struve, a true and correct copy
12 of which is attached as **Exhibit 1**.

13 7. I am over eighteen years of age, of sound mind, and fully-competent to make this
14 declaration. All statements in this declaration are based on my own personal knowledge and
15 observation and from my review of the court and business records in this case, or upon
16 information and belief as indicated. If called to testify on this matter, I can and would competently
17 testify to the matters set forth in this Declaration.

18 I declare under penalty of perjury pursuant to the laws of the United States of America that
19 the foregoing is true and correct.

20 Executed this 4th day of February, 2021, in Houston, Texas.

21
22 By: 

23 RICHARD FRANKEL
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